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January 20, 2023

VIA ECF

Hon. Sanket J. Bulsara, U.S.M.J.
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn New York 11201

Re: Friedman v. Univest Bank and Trust Co., No. 22-CV-003858 (E.D.N.Y.)

Dear Judge Bulsara:

This firm represents defendant Univest Bank and Trust Co. (“Univest”)¹ in the above-referenced action. I write in response to your order of January 13, 2023, in which you directed Univest to inform the Court by January 20, 2023 whether it will seek Rule 11 sanctions against incoming counsel for plaintiff, Ms. Margaret Farid of Roy Farid LLP.

In response to the Court’s order, counsel for Univest contacted incoming counsel on January 13, 2023, and again on January 17 and January 19, to ascertain whether Ms. Farid intends to prosecute the claims in the current complaint. As of the date and time of writing of this letter, Univest has not received a substantive response from Ms. Farid, who has indicated that she is still reviewing the file.

In light of the above, Univest does not intend to seek sanctions against Ms. Farid or her firm at this time, and wishes to prosecute the pending Rule 11 motion against Plaintiff only, pursuant to the current schedule for the briefing on that motion. If future events occur that, in Univest’s view, give rise to liability for Rule 11 sanctions on the part of incoming counsel, Univest will follow the procedures dictated by Rule 11 and file a separate motion in accordance with that rule.

¹ Univest is incorrectly identified in the Complaint in this action as Univest National Bank and Trust Co., which is a former registered name of Univest.



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Should the Court require any further information or wish to discuss the above with counsel, Univest would be happy to provide such information or appear for a conference at the Court's convenience.

Respectfully submitted,

/s/ Paige M. Willan

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PMW:pmw
cc: Counsel of Record (via ECF)